

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

AMERICAN FEDERATION OF,)
GOVERNMENT EMPLOYEES, *et al.*)
Plaintiffs,) Case No. 3:25-cv-01870-WHA
v.)
UNITED STATES OFFICE OF PERSONNEL)
MANAGEMENT, *et al.*,) The Hon. William H. Alsup
Defendants.) Date: June 9, 2025

AMENDED DECLARATION OF LEW J. OLOWSKI

1. I am the Director of the Bureau of Global Talent Management for the Department of State (the “Department”). In this role, I serve as the equivalent of the Chief Human Capital Officer for the Department.
2. On May 7, 2025, I signed a declaration certifying, among other items, that [REDACTED] identified as a probationary employee, resigned from the Department prior to receiving a notice that [REDACTED] employment with the Department was being terminated.
3. Since I signed the declaration, I received updated information that [REDACTED]: a) did not resign but was terminated; b) received a notice from the Department terminating [REDACTED] employment based on a variation of the template termination letter circulated by the Office of Personnel Management without an individualized evaluation of [REDACTED] performance or fitness; and c) was not a probationary employee at the time of [REDACTED] termination. To assure compliance with this Court’s April 18, 2025 Order, the Department is sending [REDACTED] a written communication stating that [REDACTED] termination was not performance- or fitness-based, but was made as part of a government-wide mass termination.

Pursuant to 28 U.S.C. § 1746, I certify under penalty of perjury that the foregoing is true and correct. Executed on June 9, 2025.



Lew J. Ołowski